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DEPARTMENT OF FISH AND WILDLIFE  
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October 26, 2015

Ms. Edith Hannigan  
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ATTN: Mr. Matt Dias  
Acting Executive Officer,  
California Board of Forestry and Fire Protection

Dear Ms. Hannigan:

**NOTICE OF PREPARATION, DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT  
REPORT FOR CALIFORNIA BOARD OF FORESTRY AND FIRE PROTECTION  
VEGETATION TREATMENT PROGRAM**

Thank you for the opportunity to provide comments to the October 5, 2015 Notice of Preparation (NOP) for the intended Draft Programmatic Environmental Impact Report (DPEIR) for the California Board of Forestry and Fire Protection's (Board's) Vegetation Treatment Program (VTP).

The California Department of Fish and Wildlife (CDFW) has jurisdiction over the conservation, protection, and management of fish, wildlife, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). CDFW also has regulatory authority under the California Endangered Species Act (CESA), Native Plant Protection Act, the Natural Community Conservation Planning Act, and other provisions of Fish and Game Code that afford conservation and protection to California's fish and wildlife resources.

CDFW offers the following general comments and recommendations in response to the NOP to aid Board's efforts in adequately scoping important issues. CDFW will provide additional and more specific comments after release of the DPEIR.

Consistency with Existing Plans: CDFW recommends the VTP DPEIR reference and be consistent with existing applicable plans such as the 2015 State Wildlife Action Plan, various cooperative fire protection agreement and operation plans, habitat conservation plans and natural community conservation plans.

Vegetation Analysis, Mapping, and Standardization: CDFW has worked closely with local, state, and federal agency partners to develop the Second Edition of *A Manual of California Vegetation* to provide a standardized, floristic-based systematic classification and description of vegetation in California (Sawyer et. al, 2009). The method of vegetation classification used in this manual represents the standards for large-scale vegetation maps recently adopted by the State of California. CDFW recommends the DPEIR use this vegetation classification system to help better determine the extent of common, rare, and unique habitats in need of protection and allow for a more comprehensive planning effort.

Subsequent Environmental Review: CDFW is concerned that forthcoming projects that will be tiered to the VTP PEIR may prompt parties to merely query the California Natural Diversity Database (CNDDDB) or the Biogeographic Information and Observation System (BIOS) in lieu of on-the-ground general biological surveys. Although these databases provide useful information for determining which species are potentially present on a site, they alone are not always an appropriate substitute for project-level general biological surveys. It is not clear what criteria would determine the need for surveys.

Projects conducted under the VTP PEIR within habitat occupied by species listed as threatened, endangered, or candidate for listing under CESA would require further consultation with CDFW. Such pre-project consultation would be necessary to determine if a permit would be warranted because of the potential for the incidental take of a listed species (Fish & G. Code, § 2080 *et seq.*).

Climate Change: One of greatest effects of a changing climate in California will be on the frequency and intensity of fires. As the state warms, the length of the dry season expands, and precipitation becomes more unpredictable, vegetation regimes will change across the state. These altered regimes may be more or less fire-adapted, in a climate that is potentially less resilient to large fires. CDFW recommends that the DPEIR incorporate the most current scientific literature detailing the effects of climate change on California's vegetation and fire regime.

Invasive Species Management: CDFW believes removing invasive species and retaining native species should be a goal for every VTP project, not on a case-by-case basis. VTP projects should include field analyses and effective strategies to prevent invasive species from expanding into project treatment areas. Post-treatment follow-up monitoring should also be considered to address changed conditions stemming from the project and include mitigation to actually effectively control and remove noxious and problematic weeds.

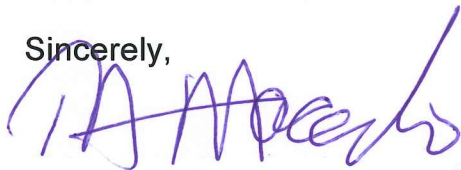
Coordination with CDFW: The 1994 *Interim Joint CDFW/Board Policy on Pre, During, and Post Fire Activities and Wildlife Habitat* (Joint Policy) outlines a process to facilitate

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needed coordination to achieve common goals and objectives, develop implementation plans for fire-related activities and address potential effects on wildlife habitat. CDFW recommends VTP PEIR acknowledge this Joint Policy as part of a basis for a cooperative working relationship between CalFire and CDFW regarding CalFire's VTP.

If you have any questions, please contact CDFW Environmental Program Manager William Condon at (916) 651-3110 or [William.Condon@wildlife.ca.gov](mailto:William.Condon@wildlife.ca.gov).

Sincerely,



Richard Macedo  
Chief, Habitat Conservation Planning Branch

Literature Cited:

Sawyer, John O.; Keeler-Wolf, Todd and Julie M. Evens. 2009. A Manual of California Vegetation. Second Edition. California Native Plant Society, Sacramento, California, USA. 1,300 pages. ISBN 978-0-943460-49-9

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